



Annual Performance Report

OMB No. 2010-0032
Expiration Date: 06/30/03

Facility Name: Brown & Williamson Tobacco Corporation
Performance Track ID #: A040051
Annual Performance Report #: 1
Reporting Year: 2001
Due Date: 07/01/2002

Section A. General Facility Information

Please supply or revise information in A.1 – A.8 as is necessary to ensure that it is accurate, complete, and up-to-date. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

A.1 Name of your facility: Brown & Williamson Tobacco Corporation

A.2 Name of your parent company: British American Tobacco

A.3 Facility contact person for the Performance Track program:

Name: Mr. Charles Brazell

Title: Senior Environment, Health & Safety Specialist

Phone: (478) 464-8766

Fax: (478) 464-4017

E-mail: charles_brazell@bat.com

A.4 Facility's location

Street Address: 2600 Weaver Road

Address (cont.):

City: Macon

State: GA

Zip Code: 31217

A.5 Facility's Website address (if any):

www.brownandwilliamson.com

A.6 Number of employees (full-time equivalents) who currently work in the facility:

More than 1000

A.7 Does your company meet the Small Business Administration definition of a small business for your sector?

No

A.8 North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility:

312221

A.9 In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them here:

No

A.10 Please update the list of environmental requirements that apply to your facility by listing any changes that have taken place during this reporting period. If you have no changes to report, please enter "No changes".

No changes

Section B. Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*.

a. Was an EMS audit or other assessment done by an independent third party?

Yes

If yes, please provide the type (e.g., ISO 14001 certification), the scope, and the dates (mo/yr) of each assessment.

Type	Scope	Dates (mo/yr)
ISO 14001	<p>The following management standard clauses were evaluated in various departments:</p> <ul style="list-style-type: none"> 4.1- General Requirements 4.2-Environmental Policy 4.3.1-Environmental Aspects 4.3.2-Legal and other requirements 4.3.3-Objectives and Targets 4.3.4-Environmental Management Programs 4.4.1-Structure & Responsibility 4.4.2-Training, Awareness 4.4.3-Communication 4.4.4.-Environmental Management Documentation 4.4.5-Document Control 4.4.6-Operational Control 4.4.7-Emergency Preparedness and Response 4.5.1-Monitoring and Measurement 4.5.2-Nonconformance and Corrective/Preventive action 4.5.3-Records 4.5.4-Environmental Management Systems Audit 4.6-Management Review 	09/2001
ISO 14001	<p>The following management standard clauses were evaluated in various departments:</p> <ul style="list-style-type: none"> 4.1-General Requirements 4.2-Environmental Policy 4.3.1-Environmental Aspects 4.3.2-Legal and other requirements 4.3.3-Objectives and Targets 4.3.4-Environmental Management Programs 4.4.1-Structure & Responsibility 4.4.2-Training and Awareness 4.4.3-Communication 4.4.4-Environmental Management System Documentation 4.4.5-Document Control 4.4.6-Operational Control 4.4.7-Emergency Preparedness and Response 4.5.1-Monitoring and Measurement 4.5.2-Nonconformance and Corrective/Preventative action 4.5.3-Records 	03/2001

	4.5.4-Environmental Management Systems Audit 4.6-Management Review	
--	---	--

b. Was an internal or corporate EMS audit conducted? Yes
If yes, please provide the scope and dates (mo/yr) of each audit.

Scope	Date (mo/yr)
Internal assessments performed in various departments against the following ISO 14001 clauses: 4.3.3-Objectives and Targets 4.3.4-Environmental Management Program 4.4.1-Structure and Responsibility 4.4.2-Training, Awareness and Competence 4.4.3-Communication 4.4.4-Environmental Management System 4.4.5-Document Control 4.4.6-Operational Control 4.5.1-Monitoring and Measurement 4.5.2-Nonconformance & Corrective Action 4.5.3-Records	12/01
Internal assessments performed in various departments against the following ISO 14001 clauses: 4.2-Environmental Policy 4.3.1-Environmental Aspects 4.3.2-Legal and other Requirements 4.3.3-Objectives and Targets 4.3.4-Environmental Management Program 4.4.1-Structure and Responsibility 4.4.2-Training, Awareness and Competence 4.4.3-Communication 4.4.4-Environmental Management System 4.4.5-Document Control 4.4.6-Operational Control 4.4.7-Emergency Preparedness & Response 4.5.1-Monitoring and Measurement 4.5.2-Nonconformance & Corrective Action 4.5.3-Records 4.5.4-Env. Management Systems Audit 4.6-Management Review	9/01
Internal assessments performed in various departments against the following ISO 14001 clauses: 4.1-General Requirements 4.2-Document Control	4/01

c. Was a compliance audit conducted?

No

If yes, please provide the scope and the dates (mo/yr) of each audit, and indicate who conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Scope	Dates	Who conducted the audit
-------	-------	-------------------------

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

Inspection by POTW (Macon Water Authority), Hazardous Waste Inspection by Georgia EPD, Air Inspection by Georgia EPD

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audit

EMS Training and Communication:
Provided contractors and employees with additional training regarding the EMS.

Chemical Management:
Reviewed chemical listing and labeling.

Waste Management:
Provided additional training on waste handling and labeling.

Measuring/Monitoring:
Reinstalled high level sensors on neutralization basin.
Provided training to employees on monitoring requirements.
Audited sources of discharges.

Objectives and Targets:
Implemented system to more efficiently track progress against objectives and targets.

Emergency Preparedness:
Implemented intermittent testing of alarm system.
Provided additional training on evacuation procedures.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

Yes

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed?

05/2002

Who headed the review? Name: Mrs. Donna Clark **Title:** Quality Systems Manager II, ISO Management Rep.

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001?

Yes

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects?

09/2000

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. You may limit the summary to environmental aspects that are *significant* and towards which progress has been made during the *reporting year*. In cases where *progress* relates specifically to a Performance Track performance commitment, complete the Environmental Aspect column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C."

Environmental Aspect	Progress Made This Year (e.g., quantitative or qualitative improvements, activities conducted)
Wastewater Discharges	New sampling methods and designs have been developed. Education and system enhancements have been implemented.
Powerhouse Operations Strategy- Energy Use	An energy audit was performed at the powerhouse in 2001
Environmental Awareness Training	Environmental Awareness Training was provided to >2000 employees. This training consisted of a review of EMS Objectives and Targets as well as a summary of employee's overall impact on the environment.
Total Waste Recycling	An 65% Recycling Objective was established for 2001. Several programs were initiated and the company obtained a 69% recycle rate in December with an overall 2001 average of 60%. Several programs will be implemented in 2002 to achieve a higher recycle rate.
Compressed Gas Training	A more detailed compressed gas training program was developed for specific employees (e.g. maintenance personnel). Compressed gas handling was categorized as a significant aspect.
Treatment, Storage, and Disposal Facilities - Audits	EH&S Audits were conducted in 2001 on 19 TSD facilities utilized by the Macon Facility.
Filter Tow Recycling	Performance Commitment - See Section C
Total Energy Use	Performance Commitment - See Section C
Contractor/Supplier Environmental Evaluation System	In 2001, a system was implemented to evaluate EH&S performance of contractors utilized by the Macon facility.
Radiation Source Reduction	A program is currently being evaluated to significantly reduce the quantity of radiation sources at the Macon facility. A 20% reduction target was set, however, the evaluation will not be completed until late 2002.
Total Water Use	In 2001, a 3% water reduction target was set. Brown & Williamson achieved a 8.2% reduction.
Hazardous Waste Reduction	Performance Commitment - See Section C
Materials Use Reduction	Performance Commitment - See Section C

Section C. Environmental Performance Commitments

Please use the tables below to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment.

C.1 Performance Commitment 1

- a. Use this table to report data related to your first performance commitment.

Category:	Materials Use				
Aspect :	Total Materials Use				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	12200000	10965705			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	0.9			Optional:
Basis for your Normalizing Factor	Production units				
Normalized Quantity* (per year)	12200000	12184116.7			10700000
*Calculated for you					

- b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

The company's ability to achieve the goal set in this performance commitment was premised on a project to reduce a component in product packaging. The project has been placed on hold to address machinability issues associated with this change. If the equipment problem cannot be resolved by the end of 2002, Brown & Williamson will submit a performance commitment change notification.

If you have additional information that you would like to include please attach it here:

Any attachments will be located at the end of the report.

- c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

C.2 Performance Commitment 2

- a. Use this table to report data related to your second performance commitment.

Category :	Waste				
Aspect :	Hazardous Solid Waste				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	75400	81917			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	0.9			Optional:
Basis for your Normalizing Factor	Production units				
Normalized Quantity* (per year)	75400	91018.9			50000
*Calculated for you					

- b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Improvements were not realized in 2001 for this aspect. Brown & Williamson was accepted into Performance Track in July 2001. Therefore, a recycling facility was not identified and audited in time to show improvement towards this commitment. A facility was approved in late 2001 and the waste stream has been re-classified as a product. Recycling began in January 2002 and there has been a 42% decrease in hazardous waste generation through May 2002. Brown & Williamson expects to achieve the goal set in this performance commitment in 2002.

Attach:

Any attachments will be located at the end of the report.

- c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

C.3 Performance Commitment 3

- a. Use this table to report data related to your third performance commitment.

Category :	Materials Use				
Aspect :	Recycled/Reused Materials Use				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	0	242560			Optional:
Measurement Units	lbs				
Normalizing Factor	1.0	0.9			Optional:
Basis for your Normalizing Factor	Production units				
Normalized Quantity* (per year)	0	269511.1			300000
*Calculated for you					

- b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

A filter tow recycling project was implemented in April 2001, however, Brown & Williamson will not meet the target set by utilizing only the recycling of filter tow (242,560 lbs in 2001). The performance commitment (600,000 lbs reduction) was calculated based on predicted generation of filter tow by the facility. This value was an overestimation of the true waste generation. The performance commitment has been updated to reflect the quantity of material that can be recycled versus the quantity of material diverted from the landfill. However, in order to enhance the recycling program, Brown & Williamson implemented several recycling initiatives in addition to the filter tow. The initiatives are excellent examples of Brown & Williamson's commitment to the environment. Brown & Williamson expects to meet the revised commitment of 300,000 lbs by 2003.

Attach:

Any attachments will be located at the end of the report.

- c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

C.4 Performance Commitment 4

- a. Use this table to report data related to your fourth performance commitment.

Category :	Energy Use				
Aspect :	Total Energy Use				
	Aspect Specifics (Optional):				
	Baseline (as stated in your application)	Year 1	Year 2	Year 3	Performance Commitment (the goal stated in your application)
Calendar Year	2000	2001	2002	2003	2003
Actual Quantity (per year)	1952254	1862460			Optional:
Measurement Units	mmBtu				
Normalizing Factor	1.0	0.9			Optional:
Basis for your Normalizing Factor	production units				
Normalized Quantity* (per year)	1952254	2069400			1854641.3
*Calculated for you					

- b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Brown & Williamson was accepted into the Performance Track Program in July 2001. Progress was delayed on this performance commitment until an appropriate energy optimization committee could be formed. This committee (comprised of management and union representatives) was established on January 15, 2002. Since that time, over 50 energy saving ideas have been addressed across the facility. With the implementation of this committee, Brown & Williamson is confident that our performance commitment will be realized in 2003.

Attach:

Any attachments will be located at the end of the report.

- c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g. Energy Star, Project XL).

Section D.

Public Outreach and Performance Reporting

D.1 Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

Individuals at the Macon facility continue to participate in local community meetings held by the Macon Chamber of Commerce EHS Committee, Government Affairs Committee, and Military Affairs Committees. A facility representative also attended regular meetings of the Macon-Bibb County Keep America Beautiful Industrial and Recycling Committee. The facility also worked with the local fire department on evacuation drills and emergency response. The Brown & Williamson website also provides a link whereby questions on environmental matters can be routed to a company representative. This website also contains information on Brown & Williamson's environmental performance.

Attachment:

Any attachments will be located at the end of the report.

D.2 Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Report available to the public. Please check as many as appropriate.

Web Site

URL:

<http://www.brownandwilliamson.com/BWT/Index.cfm?ID=71&Sect=3>

Other:

Section E.

Self-Certification of Continued Program Participation

On behalf of **Brown & Williamson Tobacco Corporation,**
(name of my facility)

I certify that

-- I have read and agree to the terms and conditions as specified in the *National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;

-- I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;

-- My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

-- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance;

-- Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environment Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date

Printed Name

Mr. Dan Snyder

Title

Sr. Vice President, Operations

Phone Number

478-464-3500

E-mail Address

Facility Name

Brown & Williamson Tobacco Corporation

Facility Street Address

2600 Weaver Road

Macon, GA 31217

Performance Track ID#

A040051

Appendix:

Do you want to add Appendix?

When adding additional comments, please refer to question number.

Comments:

Attachment:

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.